



# Annual Financial Statements & Other Information

**November 30, 2024**

Level Four Large Cap Growth Active ETF ([NASDAQ: LGRO](#))

An ALPS Advisors Solution

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# Level Four Large Cap Growth Active ETF

## Schedule of Investments

November 30, 2024

Security Description	Shares	Value
<b>COMMON STOCKS (99.71%)</b>		
<b>Communication Services (11.05%)</b>		
Alphabet, Inc., Class A	25,326	\$ 4,278,828
Meta Platforms, Inc., Class A	5,244	3,011,734
Netflix, Inc. <sup>(a)</sup>	2,408	2,135,439
Walt Disney Co.	6,939	815,124
<b>Total Communication Services</b>		<u>10,241,125</u>
<b>Consumer Discretionary (16.44%)</b>		
Amazon.com, Inc. <sup>(a)</sup>	24,352	5,062,538
Booking Holdings, Inc.	657	3,417,701
Etsy, Inc. <sup>(a)</sup>	11,558	634,072
Home Depot, Inc.	4,607	1,977,002
McDonald's Corp.	2,821	835,044
PulteGroup, Inc.	6,768	915,507
RH <sup>(a)</sup>	6,175	2,378,239
<b>Total Consumer Discretionary</b>		<u>15,220,103</u>
<b>Consumer Staples (1.05%)</b>		
Constellation Brands, Inc., Class A	2,959	712,971
Estee Lauder Cos., Inc., Class A	3,591	258,983
<b>Total Consumer Staples</b>		<u>971,954</u>
<b>Energy (1.11%)</b>		
Phillips 66	7,700	1,031,646
<b>Financials (15.02%)</b>		
Blackrock, Inc.	3,021	3,089,879
Fidelity National Information Services, Inc.	10,979	936,509
Mastercard, Inc., Class A	3,356	1,788,547
Morgan Stanley	16,554	2,178,672
MSCI, Inc.	3,237	1,973,372
PayPal Holdings, Inc. <sup>(a)</sup>	35,234	3,057,253
Visa, Inc., Class A	2,823	889,471
<b>Total Financials</b>		<u>13,913,703</u>
<b>Health Care (5.27%)</b>		
AbbVie, Inc.	5,553	1,015,809
Biogen, Inc. <sup>(a)</sup>	3,690	592,725
UnitedHealth Group, Inc.	3,893	2,375,509
Vertex Pharmaceuticals, Inc. <sup>(a)</sup>	1,927	902,087
<b>Total Health Care</b>		<u>4,886,130</u>
<b>Industrials (7.40%)</b>		
Fortive Corp.	10,184	807,897
Lockheed Martin Corp.	1,794	949,761
Paycom Software, Inc.	4,095	949,712
TransDigm Group, Inc.	611	765,565
Uber Technologies, Inc. <sup>(a)</sup>	33,616	2,419,008
United Rentals, Inc.	1,115	965,590
<b>Total Industrials</b>		<u>6,857,533</u>
<b>Information Technology (40.75%)</b>		
Apple, Inc.	28,108	6,670,872
Applied Materials, Inc.	7,608	1,329,194

Security Description	Shares	Value	
<b>Information Technology (continued)</b>			
Broadcom, Inc.	9,946	\$ 1,612,048	
Cognizant Technology Solutions Corp., Class A	11,549	929,579	
DocuSign, Inc. <sup>(a)</sup>	27,104	2,159,918	
Lam Research Corp.	34,763	2,568,290	
Micron Technology, Inc.	13,549	1,327,125	
Microsoft Corp.	12,330	5,221,261	
Monolithic Power Systems, Inc.	2,280	1,294,219	
NVIDIA Corp.	26,377	3,646,620	
Palo Alto Networks, Inc. <sup>(a)</sup>	2,638	1,023,069	
Salesforce, Inc.	5,655	1,866,093	
ServiceNow, Inc. <sup>(a)</sup>	2,131	2,236,357	
Snowflake, Inc., Class A <sup>(a)</sup>	18,314	3,201,287	
Twilio, Inc., Class A <sup>(a)</sup>	25,459	2,661,484	
<b>Total Information Technology</b>		<u>37,747,416</u>	
<b>Real Estate (1.62%)</b>			
Zillow Group, Inc. <sup>(a)</sup>	17,705	1,499,791	
<b>TOTAL COMMON STOCKS</b> (Cost \$68,026,801)		<u>92,369,401</u>	
	<b>7 Day Yield</b>	<b>Shares</b>	
<b>SHORT TERM INVESTMENTS (0.29%)</b>		<b>Value</b>	
<b>Money Market Fund (0.29%)</b>			
State Street Institutional Treasury Plus Money Market Fund (Premier Class)	4.59%	272,444	\$ 272,444
<b>TOTAL SHORT TERM INVESTMENTS</b> (Cost \$272,444)			<u>272,444</u>
<b>TOTAL INVESTMENTS (100.00%)</b> (Cost \$68,299,245)			\$ 92,641,845
<b>OTHER ASSETS IN EXCESS OF LIABILITIES (0.00%)</b>			<u>3,954</u>
<b>NET ASSETS - 100.00%</b>			<u>\$ 92,645,799</u>

<sup>(a)</sup> Non-income producing security.

See Notes to Financial Statements and Financial Highlights.

# Level Four Large Cap Growth Active ETF

## Statement of Assets and Liabilities

November 30, 2024

<b>ASSETS:</b>		
Investments, at value	\$	92,641,845
Dividends receivable		40,907
<b>Total Assets</b>		<b>92,682,752</b>
<b>LIABILITIES:</b>		
Payable to adviser		36,953
<b>Total Liabilities</b>		<b>36,953</b>
<b>NET ASSETS</b>	<b>\$</b>	<b>92,645,799</b>
<b>NET ASSETS CONSIST OF:</b>		
Paid-in capital	\$	68,388,880
Total distributable earnings/(accumulated losses)		24,256,919
<b>NET ASSETS</b>	<b>\$</b>	<b>92,645,799</b>
<b>INVESTMENTS, AT COST</b>	<b>\$</b>	<b>68,299,245</b>
<b>PRICING OF SHARES</b>		
Net Assets	\$	92,645,799
Shares of beneficial interest outstanding (Unlimited number of shares authorized, par value \$0.01 per share)		2,628,400
Net Asset Value, offering and redemption price per share	\$	35.25

See Notes to Financial Statements and Financial Highlights.

# Level Four Large Cap Growth Active ETF

## Statement of Operations

For the Year Ended November 30, 2024

<b>INVESTMENT INCOME:</b>	
Dividend income*	\$ 766,298
Securities lending income	8
<b>Total investment income</b>	<b>766,306</b>
<b>EXPENSES:</b>	
Investment adviser fees	403,937
Other expenses	3,371
<b>Total expenses</b>	<b>407,308</b>
<b>NET INVESTMENT INCOME</b>	<b>358,998</b>
<b>REALIZED AND UNREALIZED GAIN/(LOSS):</b>	
Net realized gain on investments <sup>(a)</sup>	3,807,783
Net realized loss on foreign currency transactions	(6)
<b>Total Net realized gain</b>	<b>3,807,777</b>
Net change in unrealized appreciation on investments	19,683,905
<b>NET REALIZED AND UNREALIZED GAIN ON INVESTMENTS</b>	<b>23,491,682</b>
<b>NET INCREASE IN NET ASSETS RESULTING FROM OPERATIONS</b>	<b>\$ 23,850,680</b>

\* Net of foreign tax withholding of \$47.

<sup>(a)</sup> Includes realized gain or loss as a result of in-kind transactions (See Note 4 in Notes to Financial Statements and Financial Highlights).

See Notes to Financial Statements and Financial Highlights.

# Level Four Large Cap Growth Active ETF

## Statements of Changes in Net Assets

	For the Year Ended November 30, 2024	For the Period August 22, 2023 (Commencement of Operations) to November 30, 2023
<b>OPERATIONS:</b>		
Net investment income	\$ 358,998	\$ 159,824
Net realized gain	3,807,777	9,283,702
Net change in unrealized appreciation/(depreciation)	19,683,905	(5,880,533)
Net increase in net assets resulting from operations	23,850,680	3,562,993
<b>DISTRIBUTIONS TO SHAREHOLDERS:</b>		
From distributable earnings	(472,605)	-
Total distributions	(472,605)	-
<b>CAPITAL SHARE TRANSACTIONS:</b>		
Proceeds from sale of shares	17,491,395	79,064,503*
Cost of shares redeemed	(13,367,369)	(17,483,798)
Net increase from capital share transactions	4,124,026	61,580,705
Net increase in net assets	27,502,101	65,143,698
<b>NET ASSETS:</b>		
Beginning of period	65,143,698	-
End of period	\$ 92,645,799	\$ 65,143,698
<b>OTHER INFORMATION:</b>		
<b>CAPITAL SHARE TRANSACTIONS:</b>		
Beginning shares	2,473,400	-
Shares sold	605,000	3,183,400
Shares redeemed	(450,000)	(710,000)
Shares outstanding, end of period	2,628,400	2,473,400

\* On August 22, 2023, the Fund received securities in connection with an in-kind subscription transaction. The seed shares totaled 883,398 with a NAV of \$25. For financial reporting purposes, these transactions were treated as purchases of securities and recognized based on the market value of the securities. The value of the initial in-kind subscription was \$22,084,950.

See Notes to Financial Statements and Financial Highlights.

# Level Four Large Cap Growth Active ETF

## Financial Highlights

For a Share Outstanding Throughout the Periods Presented

	For the Year Ended November 30, 2024	For the Period August 22, 2023 (Commencement of Operations) to November 30, 2023
<b>NET ASSET VALUE, BEGINNING OF PERIOD</b>	\$ 26.34	\$ 25.00
<b>INCOME FROM OPERATIONS:</b>		
Net investment income <sup>(a)</sup>	0.14	0.07
Net realized and unrealized gain	8.95	1.27
Total from investment operations	9.09	1.34
<b>DISTRIBUTIONS:</b>		
From net investment income	(0.18)	–
Total distributions	(0.18)	–
<b>NET INCREASE IN NET ASSET VALUE</b>	8.91	1.34
<b>NET ASSET VALUE, END OF PERIOD</b>	\$ 35.25	\$ 26.34
<b>TOTAL RETURN<sup>(b)</sup></b>	34.63%	5.36%
<b>RATIOS/SUPPLEMENTAL DATA:</b>		
Net assets, end of period (in 000s)	\$ 92,646	\$ 65,144
<b>RATIOS TO AVERAGE NET ASSETS</b>		
Ratio of expenses to average net assets	0.50%	0.50% <sup>(c)</sup>
Ratio of net investment income to average net assets	0.44%	1.01% <sup>(c)</sup>
Portfolio turnover rate <sup>(d)</sup>	8%	0%

<sup>(a)</sup> Based on average shares outstanding during the period.

<sup>(b)</sup> Total return is calculated assuming an initial investment made at the net asset value at the beginning of the period and redemption at the net asset value on the last day of the period and assuming all distributions are reinvested at the reinvestment prices. Total return calculated for a period of less than one year is not annualized.

<sup>(c)</sup> Annualized.

<sup>(d)</sup> Portfolio turnover for periods less than one year are not annualized and does not include securities received or delivered from processing creations or redemptions in-kind.

See Notes to Financial Statements and Financial Highlights.

# Level Four Large Cap Growth Active ETF

## Notes to Financial Statements and Financial Highlights

November 30, 2024

### 1. ORGANIZATION

ALPS ETF Trust (the "Trust"), a Delaware statutory trust, is an open-end management investment company registered under the Investment Company Act of 1940, as amended (the "1940 Act"). As of November 30, 2024, the Trust consisted of twenty-three separate portfolios. Each portfolio represents a separate series of the Trust. This report pertains solely to the Level Four Large Cap Growth Active ETF (the "Fund"). The investment objective of the Fund is to seek maximum total return and above peer average risk-adjusted return. The Fund has elected to qualify as a diversified series of the Trust under the 1940 Act.

The Fund's Shares ("Shares") are listed on the Nasdaq Stock Market LLC ("Nasdaq Exchange"). The Fund issues and redeems Shares, at net asset value ("NAV") in blocks of 5,000 Shares, each of which is called a "Creation Unit". Creation Units are issued and redeemed principally in-kind for securities. Except when aggregated in Creation Units, Shares are not redeemable securities of the Fund.

The Sub-Adviser manages multiple separately managed accounts (the "SMAs") that contributed specific assets to the Fund (the "Contribution"). The Adviser and Sub-Adviser paid all costs surrounding the Contribution. The Contribution was tax free, and the cost basis of the SMAs were carried forward to the Fund for tax and financial reporting purposes. The Contribution resulted in seed shares totaling 883,398 with a Net Asset Value of \$25. The details of the Contribution are shown below:

Net Assets	Market Value of Investments	Cost of Investments	Unrealized Appreciation
\$ 22,084,950	\$ 22,084,950	\$ 11,545,722	\$ 10,539,228

Pursuant to the Trust's organizational documents, its Officers and Trustees are indemnified against certain liability arising out of the performance of their duties to the Trust. Additionally, in the normal course of business, the Trust enters into contracts with service providers that contain general indemnification clauses. The Trust's maximum exposure under these arrangements is unknown, as this would involve future claims that may be made against the Trust that have not yet occurred.

### 2. SIGNIFICANT ACCOUNTING POLICIES

The following is a summary of significant accounting policies consistently followed by the Fund in the preparation of the financial statements. The accompanying financial statements were prepared in accordance with accounting principles generally accepted in the United States of America ("U.S. GAAP"). The preparation of financial statements in conformity with U.S. GAAP requires management to make certain estimates and assumptions that affect the reported amounts of assets and liabilities and disclosures of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenue and expenses during the period. Actual results could differ from those estimates. The Fund is considered an investment company under U.S. GAAP and follows the accounting and reporting guidance applicable to investment companies in the Financial Accounting Standards Board ("FASB") *Accounting Standards Codification* Topic 946.

#### A. Portfolio Valuation

The Fund's NAV is determined daily, as of the close of regular trading on the New York Stock Exchange (the "NYSE"), normally 4:00 p.m. Eastern Time, on each day the NYSE is open for trading. The NAV is computed by dividing the value of all assets of the Fund (including accrued interest and dividends), less all liabilities (including accrued expenses and dividends declared but unpaid), by the total number of shares outstanding.

Portfolio securities listed on any exchange other than the NASDAQ Stock Market LLC ("NASDAQ") are valued at the last sale price on the business day as of which such value is being determined. If there has been no sale on such day, the securities are valued at the mean of the most recent bid and ask prices on such day. Securities traded on the NASDAQ are valued at the NASDAQ Official Closing Price as determined by NASDAQ. Portfolio securities traded on more than one securities exchange are valued at the last sale price on the business day as of which such value is being determined at the close of the exchange representing the principal market for such securities. Portfolio securities traded in the over-the-counter market, but excluding securities traded on the NASDAQ, are valued at the last quoted sale price in such market.

The Fund's investments are valued at market value or, in the absence of market value with respect to any portfolio securities, at fair value according to procedures adopted by the Trust's Board of Trustees (the "Board"). Pursuant to Rule 2a-5 under the 1940 Act, the Board designated ALPS Advisors, Inc. (the "Adviser") as the valuation designee ("Valuation Designee") for the Fund to perform the fair value determinations relating to Fund investments. The Adviser may carry out its designated responsibilities as Valuation Designee through various teams and committees. When market quotations are not readily available or when events occur that make established valuation methods unreliable, securities of the Fund may be valued in good faith by the Valuation Designee. These securities generally include, but are not limited to, restricted securities (securities which may not be publicly sold without registration under the Securities Act of 1933) for which a pricing service is unable to provide a market price; securities whose trading has been formally suspended; a security whose market price is not available from a pre-established primary pricing source or the pricing



# Level Four Large Cap Growth Active ETF

## Notes to Financial Statements and Financial Highlights

November 30, 2024

source is not willing to provide a price; a security with respect to which an event has occurred that is most likely to materially affect the value of the security after the market has closed but before the calculation of the Fund's NAV or make it difficult or impossible to obtain a reliable market quotation; or a security whose price, as provided by the pricing service, does not reflect the security's "fair value" due to the security being de-listed from a national exchange or the security's primary trading market is temporarily closed at a time when, under normal conditions, it would be open. As a general principle, the current "fair value" of a security would be the amount which the owner might reasonably expect to receive from the sale on the applicable exchange or principal market. A variety of factors may be considered in determining the fair value of such securities.

### B. Fair Value Measurements

The Fund discloses the classification of its fair value measurements following a three-tier hierarchy based on the inputs used to measure fair value. Inputs refer broadly to the assumptions that market participants would use in pricing the asset or liability, including assumptions about risk. Inputs may be observable or unobservable. Observable inputs reflect the assumptions market participants would use in pricing the asset or liability that are developed based on market data obtained from sources independent of the reporting entity. Unobservable inputs reflect the reporting entity's own assumptions about the assumptions market participants would use in pricing the asset or liability that are developed based on the best information available.

Valuation techniques used to value the Fund's investments by major category are as follows:

Equity securities, including restricted securities, for which market quotations are readily available, are valued at the last reported sale price or official closing price as reported by a third party pricing vendor on the primary market or exchange on which they are traded and are categorized as Level 1 in the hierarchy. In the event there were no sales during the day or closing prices are not available, securities are valued at the mean of the most recent quoted bid and ask prices on such day and are generally categorized as Level 2 in the hierarchy. Investments in open-end mutual funds are valued at their closing NAV each business day and are categorized as Level 1 in the hierarchy.

Changes in valuation techniques may result in transfers in or out of an assigned level within the disclosure hierarchy.

Various inputs are used in determining the value of the Fund's investments as of the end of the reporting period. When inputs used fall into different levels of the fair value hierarchy, the level in the hierarchy within which the fair value measurement falls is determined based on the lowest level input that is significant to the fair value measurement in its entirety. The designated input levels are not necessarily an indication of the risk or liquidity associated with these investments.

These inputs are categorized in the following hierarchy under applicable financial accounting standards:

- Level 1 – Unadjusted quoted prices in active markets for identical investments, unrestricted assets or liabilities that a Fund has the ability to access at the measurement date;
- Level 2 – Quoted prices which are not active, quoted prices for similar assets or liabilities in active markets or inputs other than quoted prices that are observable (either directly or indirectly) for substantially the full term of the asset or liability; and
- Level 3 – Significant unobservable prices or inputs (including the Fund's own assumptions in determining the fair value of investments) where there is little or no market activity for the asset or liability at the measurement date.

The following is a summary of the inputs used to value the Fund's investments as of November 30, 2024:

### Level Four Large Cap Growth Active ETF

Investments in Securities at Value	Level 1 - Quoted and Unadjusted Prices	Level 2 - Other Significant Observable Inputs	Level 3 - Significant Unobservable Inputs	Total
Common Stocks*	\$ 92,369,401	\$ –	\$ –	\$ 92,369,401
Short Term Investments	272,444	–	–	272,444
Total	\$ 92,641,845	\$ –	\$ –	\$ 92,641,845

\* For a detailed breakdown of sectors, see the accompanying Schedule of Investments.

The Fund did not have any securities that used significant unobservable inputs (Level 3) in determining fair value and there were no transfers into or out of Level 3 during the year ended November 30, 2024.

# Level Four Large Cap Growth Active ETF

## Notes to Financial Statements and Financial Highlights

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### C. Securities Transactions and Investment Income

Securities transactions are recorded as of the trade date. Realized gains and losses from securities transactions are recorded on the specific identification in accordance with GAAP. Dividend income and capital gains distributions, if any, are recorded on the ex-dividend date. Interest income, if any, is recorded on the accrual basis.

### D. Dividends and Distributions to Shareholders

Dividends from net investment income of the Fund, if any, are declared and paid quarterly or as the Board may determine from time to time. Distributions of net realized capital gains earned by the Fund, if any, are distributed at least annually.

### E. Federal Tax and Tax Basis Information

The timing and character of income and capital gain distributions are determined in accordance with income tax regulations, which may differ from U.S. GAAP. Reclassifications are made to the Fund's capital accounts for permanent tax differences to reflect income and gains available for distribution (or available capital loss carryforwards) under income tax regulations.

For the year ended November 30, 2024, the following reclassifications, which had no impact on results of operations or net assets, were recorded to reflect permanent tax differences resulting primarily from in-kind transactions and prior year tax return true-up:

Fund	Paid-in Capital	Total Distributable Earnings/(Accumulated Losses)
Level Four Large Cap Growth Active ETF	\$ 3,705,864	\$ (3,705,864)

The tax character of the distributions paid during the fiscal year ended November 30, 2024 was as follows:

Fund	Ordinary Income	Long-Term Capital Gain	Return of Capital
<b>November 30, 2024</b>			
Level Four Large Cap Growth Active ETF	\$ 472,605	\$ -	\$ -

Under current law, capital losses maintain their character as short-term or long-term and are carried forward to the next tax year without expiration. As of November 30, 2024, the following amounts are available as carry forwards to the next tax year:

Fund	Short-Term	Long-Term
Level Four Large Cap Growth Active ETF	\$ -	\$ 131,843

The Fund used capital loss carryovers during the year ended November 30, 2024 in the amount of \$102,008.

As of November 30, 2024, the components of distributable earnings/(accumulated losses) on a tax basis were as follows:

Fund	Accumulated Net Investment Income	Accumulated Net Realized Gain/(Loss) on Investments	Other Accumulated Losses	Net Unrealized Appreciation/(Depreciation) on Investments	Total
Level Four Large Cap Growth Active ETF	\$ 46,201	\$ (131,843)	\$ -	\$ 24,342,561	\$ 24,256,919

# Level Four Large Cap Growth Active ETF

## Notes to Financial Statements and Financial Highlights

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As of November 30, 2024, the cost of investments for federal income tax purposes and accumulated net unrealized appreciation/(depreciation) on investments were as follows:

	<b>Level Four Large Cap Growth Active ETF</b>
Gross appreciation (excess of value over tax cost)	\$ 25,395,229
Gross depreciation (excess of tax cost over value)	(1,052,668)
Net unrealized appreciation/(depreciation)	\$ 24,342,561
Cost of investments for income tax purposes	\$ 68,299,284

The differences between book-basis and tax-basis are primarily due to the deferral of losses from wash sales.

### F. Income Taxes

No provision for income taxes is included in the accompanying financial statements, as the Fund intends to distribute to shareholders all taxable investment income and realized gains and otherwise comply with Subchapter M of the Internal Revenue Code of 1986, as amended, applicable to regulated investment companies. The Fund evaluates tax positions taken (or expected to be taken) in the course of preparing the Fund's tax returns to determine whether these positions meet a "more-likely-than-not" standard that, based on the technical merits, have a more than fifty percent likelihood of being sustained by a taxing authority upon examination. A tax position that meets the "more-likely-than-not" recognition threshold is measured to determine the amount of benefit to recognize in the financial statements.

As of and during the year ended November 30, 2024, the Fund did not have a liability for any unrecognized tax benefits. The Fund files U.S. federal, state, and local tax returns as required. The Fund's tax returns are subject to examination by the relevant tax authorities until expiration of the applicable statute of limitations, which is generally three years after the filing of the tax return, but may extend to four years in certain jurisdictions. Tax returns for open years have incorporated no uncertain tax positions that require a provision for income taxes.

### G. Lending of Portfolio Securities

The Fund has entered into a securities lending agreement with State Street Bank & Trust Co. ("SSB"), the Fund's lending agent. The Fund may lend its portfolio securities only to borrowers that are approved by SSB. The Fund will limit such lending to not more than 33 1/3% of the value of its total assets. The Fund's securities held at SSB as custodian shall be available to be lent except those securities the Fund or ALPS Advisors, Inc. specifically identifies in writing as not being available for lending. The borrower pledges and maintains with the Fund collateral consisting of cash (U.S. Dollars only), securities issued or guaranteed by the U.S. government or its agencies or instrumentalities, and cash equivalents (including irrevocable bank letters of credit) issued by a person other than the borrower or an affiliate of the borrower. The initial collateral received by the Fund is required to have a value of no less than 102% of the market value of the loaned securities for U.S. equity securities and a value of no less than 105% of the market value for non-U.S. equity securities. The collateral is maintained thereafter, at a market value equal to not less than 102% of the current value of the U.S. equity securities on loan and not less than 105% of the current value of the non-U.S. equity securities on loan. The market value of the loaned securities is determined at the close of each business day and any additional required collateral is delivered to the Fund on the next business day. During the term of the loan, the Fund is entitled to all distributions made on or in respect of the loaned securities. Loans of securities are terminable at any time and the borrower, after notice, is required to return borrowed securities within the customary time period for settlement of securities transactions.

Any cash collateral received is reinvested in a money market fund managed by SSB as disclosed in the Fund's Schedule of Investments and is reflected in the Statement of Assets and Liabilities as a payable for collateral upon return of securities loaned. Non-cash collateral, in the form of securities issued or guaranteed by the U.S. government or its agencies or instrumentalities, is not disclosed in the Fund's Statement of Assets and Liabilities or the contractual maturity table below as it is held by the lending agent on behalf of the Fund, and the Fund does not have the ability to re-hypothecate these securities. Income earned by the Fund from securities lending activity is disclosed in the Statement of Operations. As of November 30, 2024, the Fund did not have any securities on loan.

### 3. INVESTMENT ADVISORY FEE AND OTHER AFFILIATED TRANSACTIONS

ALPS Advisors, Inc. serves as the Fund's investment adviser pursuant to an Investment Advisory Agreement with the Trust on behalf of the Fund (the "Advisory Agreement"). Pursuant to the Advisory Agreement, the Fund pays the Adviser an annual management fee for the services and facilities it provides, payable on a monthly basis at the annual rate of 0.50% of the Fund's average daily net assets.

Out of the unitary management fees, the Adviser pays substantially all expenses of the Fund, including licensing fees to the Underlying Index provider, the cost of transfer agency, custody, fund administration, legal, audit, trustees and other services, except for acquired fund fees and expenses, interest

# Level Four Large Cap Growth Active ETF

## Notes to Financial Statements and Financial Highlights

November 30, 2024

expenses, distribution fees or expenses, brokerage expenses, taxes and extraordinary expenses not incurred in the ordinary course of the Fund's business. The Adviser's unitary management fee is designed to pay substantially all of the Fund's expenses and to compensate the Adviser for providing services to the Fund.

Level Four Capital Management, LLC ("Level Four" or the "Sub-Adviser") serves as the Fund's sub-adviser pursuant to a sub-advisory agreement with the Trust (the "Sub-Advisory Agreement"). Pursuant to the Sub-Advisory Agreement, the Adviser pays the Sub-Adviser a sub-advisory fee out of the Adviser's advisory fee for the services it provides. The fee is payable on a monthly basis at the annual rate of 0.25% of the Fund's average daily net assets.

ALPS Fund Services, Inc., an affiliate of the Adviser, is the administrator of the Fund.

Each Trustee receives (1) a quarterly retainer of \$25,000, (2) a per meeting fee of \$15,000, (3) \$2,500 for any special meeting held outside of a regularly scheduled board meeting, and (4) reimbursement for all reasonable out-of-pocket expenses relating to attendance at meetings. In addition, the Chairman of the Board receives a quarterly retainer of \$5,000, the Chairman of the Audit Committee receives a quarterly retainer of \$3,000, and the Chairman of the Nominating & Governance Committee receives a quarterly retainer of \$2,000, each in connection with their respective roles.

#### 4. PURCHASES AND SALES OF SECURITIES

For the year ended November 30, 2024 the cost of purchases and proceeds from sales of investment securities, excluding short-term investments and in-kind transactions, were as follows:

<b>Fund</b>	<b>Purchases</b>	<b>Sales</b>
Level Four Large Cap Growth Active ETF	\$ 12,232,327	\$ 6,344,478

For the year ended November 30, 2024, the cost of in-kind purchases and proceeds from in-kind sales were as follows:

<b>Fund</b>	<b>Purchases</b>	<b>Sales</b>
Level Four Large Cap Growth Active ETF	\$ 15,131,349	\$ 12,967,088

For the year ended November 30, 2024, the Level Four Large Cap Growth Active ETF had in-kind net realized gain of \$3,706,016.

Gains on in-kind transactions are not considered taxable for federal income tax purposes and losses on in-kind transactions are also not deductible for tax purposes.

#### 5. CAPITAL SHARE TRANSACTIONS

Shares are created and redeemed by the Fund only in Creation Unit size aggregations of 5,000 Shares. Only broker-dealers or large institutional investors with creation and redemption agreements called Authorized Participants ("AP") are permitted to purchase or redeem Creation Units from the Fund. Such transactions are generally permitted on an in-kind basis, with a balancing cash component to equate the transaction to the NAV per unit of the Fund on the transaction date. Cash may be substituted equivalent to the value of certain securities generally when they are not available in sufficient quantity for delivery, not eligible for trading by the AP or as a result of other market circumstances.

#### 6. MARKET RISK

The Fund is subject to investment and operational risks associated with financial, economic and other global market developments and disruptions, including those arising from war, terrorism, market manipulation, government interventions, defaults and shutdowns, political changes or diplomatic developments, public health emergencies (such as the spread of infectious diseases, pandemics and epidemics) and natural/environmental disasters, which can negatively impact the securities markets and cause the Fund to lose value. Securities in the Fund's portfolio may underperform in comparison to securities in general financial markets, a particular financial market or other asset classes due to a number of factors, including inflation (or expectations for inflation), deflation (or expectations for deflation), interest rates, global demand for particular products or resources, market instability, debt crises and downgrades, embargoes, tariffs, sanctions and other trade barriers, regulatory events, other governmental trade or market control programs and related geopolitical events. In addition, the value of the Fund's investments may be negatively affected by the occurrence of global events such as war, terrorism, environmental disasters, natural disasters or events, country instability, and infectious disease epidemics or pandemics.

### **7. SUBSEQUENT EVENTS**

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Subsequent events, if any, after the date of the Statement of Assets and Liabilities have been evaluated through the date the financial statements were issued. Management has determined that there were no subsequent events to report through the issuance of these financial statements.

# Level Four Large Cap Growth Active ETF

## Report of Independent Registered Public Accounting Firm

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To the Shareholders of Level Four Large Cap Growth Active ETF and Board of Trustees of ALPS ETF Trust

### Opinion on the Financial Statements

We have audited the accompanying statement of assets and liabilities, including the schedule of investments, of Level Four Large Cap Growth Active ETF (the "Fund"), a series of ALPS ETF Trust, as of November 30, 2024, the related statement of operations for the year then ended, the statements of changes in net assets and financial highlights for the year then ended and for the period August 22, 2023 (commencement of operations) through November 30, 2023, and the related notes (collectively referred to as the "financial statements"). In our opinion, the financial statements present fairly, in all material respects, the financial position of the Fund as of November 30, 2024, the results of its operations for the year then ended, and the changes in net assets and financial highlights for the year then ended and for the period August 22, 2023 (commencement of operations) through November 30, 2023, in conformity with accounting principles generally accepted in the United States of America.

### Basis for Opinion

These financial statements are the responsibility of the Fund's management. Our responsibility is to express an opinion on the Fund's financial statements based on our audits. We are a public accounting firm registered with the Public Company Accounting Oversight Board (United States) ("PCAOB") and are required to be independent with respect to the Fund in accordance with the U.S. federal securities laws and the applicable rules and regulations of the Securities and Exchange Commission and the PCAOB.

We conducted our audits in accordance with the standards of the PCAOB. Those standards require that we plan and perform the audit to obtain reasonable assurance about whether the financial statements are free of material misstatement whether due to error or fraud.

Our audits included performing procedures to assess the risks of material misstatement of the financial statements, whether due to error or fraud, and performing procedures that respond to those risks. Such procedures included examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements. Our procedures included confirmation of securities owned as of November 30, 2024, by correspondence with the custodian. Our audits also included evaluating the accounting principles used and significant estimates made by management, as well as evaluating the overall presentation of the financial statements. We believe that our audits provide a reasonable basis for our opinion.

We have served as the auditor of one or more investment companies advised by ALPS Advisors, Inc. since 2013.



COHEN & COMPANY, LTD.  
Philadelphia, Pennsylvania  
January 29, 2025

# Level Four Large Cap Growth Active ETF

Additional Information

November 30, 2024 (Unaudited)

## TAX INFORMATION

The Level Four Large Cap Growth Active ETF designates the following as a percentage of taxable ordinary income distributions, or up to the maximum amount allowable, for the calendar year ended December 31, 2023:

	Qualified Dividend Income	Dividend Received Deduction	199A
Level Four Large Cap Growth Active ETF	100.00%	90.18%	0.00%

In early 2024, if applicable, shareholders of record received this information for the distributions paid to them by the Fund during the calendar year 2023 via Form 1099. The Fund will notify shareholders in early 2025 of amounts paid to them by the Fund, if any, during the calendar year 2024.

## Level Four Large Cap Growth Active ETF

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Changes in and Disagreements with Accountants  
for Open-End Management Investment Companies

*November 30, 2024 (Unaudited)*

Not applicable for this reporting period.



# Level Four Large Cap Growth Active ETF

## Proxy Disclosures for Open-End Management Investment Companies

November 30, 2024 (Unaudited)

A Special Meeting of Shareholders of the Funds, each a series of the Trust, was held on July 19, 2024. At the meeting, the following matters were voted on by the Shareholders. The results of the Special Meeting of Shareholders are noted below:

Proposal 1: To elect seven Trustees.

	<b>Shares Voted in Favor</b>	<b>Shares Voted Against/Withheld or Abstentions</b>	<b>Proposal Approved</b>
Mary K. Anstine	223,143,090	2,894,793	Yes
Edmund J. Burke	223,362,578	2,672,643	Yes
Jeremy W. Deems	221,670,341	4,361,535	Yes
Rick A. Pederson	213,137,140	12,259,226	Yes
Joseph F. Keenan	223,547,500	2,483,867	Yes
Susan K. Wold	223,460,006	2,571,857	Yes
Laton Spahr	223,439,610	2,593,995	Yes

# Level Four Large Cap Growth Active ETF

## Remuneration Paid to Directors, Officers, and Others of Open-End Management Investment Companies

November 30, 2024 (Unaudited)

The following chart provides certain information about the Trustee fees paid by the Trust for the year ended November 30, 2024:

	Aggregate Regular Compensation From the Trust	Aggregate Special Compensation From the Trust	Total Compensation From the Trust
Mary K. Anstine, Trustee	\$ 162,500	\$ —	\$ 162,500
Edmund J. Burke, Trustee	166,500	—	166,500
Jeremy W. Deems, Trustee	174,500	—	174,500
Rick A. Pederson, Trustee	186,500	—	186,500
Joseph F. Keenan, Trustee	40,000	—	40,000
Susan K. Wold, Trustee	40,000	—	40,000
Laton Spahr, President and Trustee*	—	—	—
<b>Total</b>	<b>\$ 770,000</b>	<b>\$ —</b>	<b>\$ 770,000</b>

\* *Mr. Spahr, the President of the Trust, is deemed an "interested person" by virtue of his position as an officer of the Trust and of ALPS Advisors, Inc.*

Officers who are employed by the Adviser receive no compensation or expense reimbursement from the Trust.

# Level Four Large Cap Growth Active ETF

## Statement Regarding Basis

November 30, 2024 (Unaudited)

## for Approval of Investment Advisory Contract

At its meetings held on June 3, 2024 and June 18, 2024, the Board of Trustees of the Trust (the “Board” or the “Trustees”), where each Trustee was not an “interested person” of the Trust within the meaning of the Investment Company Act of 1940, as amended (the “Independent Trustees”), evaluated a proposal to approve the continuance of (i) the Investment Advisory Agreement between the Trust and ALPS Advisors, Inc. (the “Adviser” or “AAI”) with respect to the Level Four Large Cap Growth Active ETF (the “Fund” or “LGRO”) and (ii) the Investment Sub-Advisory Agreement between the Trust, AAI and Level Four Capital Management, LLC (the “Sub-Adviser” or “Level Four”) with respect to the Fund (the “Level Four Sub-Advisory Agreement”).

In evaluating the renewal of the Investment Advisory Agreement with respect to the Fund, the Board, including the Independent Trustees considered various factors, including (i) the nature, extent and quality of the services provided by AAI with respect to the Fund under the Investment Advisory Agreement; (ii) the advisory fees and other expenses paid by the Fund compared to those of similar funds managed by other investment advisers; (iii) the costs of the services provided to the Fund by AAI and the profits realized by AAI and its affiliates from its relationship to the Fund; (iv) the extent to which economies of scale have been or would be realized if and as the assets of the Fund grow and whether fees reflect the economies of scale for the benefit of shareholders; and (v) any additional benefits and other considerations.

With respect to the nature, extent and quality of the services provided by AAI under the Investment Advisory Agreement, the Board considered and reviewed information concerning the services provided under the Investment Advisory Agreement, financial information regarding AAI and its parent company, information describing AAI’s current organization and the background and experience of the persons responsible for the day-to-day management of the Fund.

The Board reviewed information on the performance of the Fund and its applicable benchmark for the 3 month and since inception periods and against the appropriate FUSE performance universe. Based on this review, the Board, including the Independent Trustees found that the nature and extent of services provided to the Fund under the Investment Advisory Agreement was appropriate and that the quality of such services was satisfactory.

The Board noted that the advisory fees for the Fund were unitary fees pursuant to which AAI assumes all expenses of the Fund (including the cost of transfer agency, custody, fund administration, legal, audit and other services) other than the payments under the Advisory Agreement, brokerage expenses, taxes, interest, litigation expenses and other extraordinary expenses.

Based on the information available to them, including the Fund-specific summary set forth below, the Board, including the Independent Trustees concluded that the advisory fee rate for the Fund was reasonable under the circumstances and in light of the quality of the services provided.

The Board, including the Independent Trustees considered other benefits available to AAI because of its relationship with the Fund and concluded that the advisory fees were reasonable taking into account any such benefits.

The Board, including the Independent Trustees, also considered with respect to the Fund the information provided by AAI about the costs and profitability of AAI with respect to the Fund, including the asset levels and other factors that influence the profitability and financial viability of the Fund. The Board, including the Independent Trustees reviewed and noted the relatively small size of the Fund and the analysis AAI had conducted to support AAI’s assertion that it was not realizing any economies of scale with respect to the Fund. The Independent Trustees determined that AAI should continue to keep the Board informed on an ongoing basis of any significant developments (e.g., material increases in asset levels) so as to facilitate the Independent Trustees’ evaluation of whether further economies of scale have been achieved.

The Board, including the Independent Trustees, also considered other potential benefits available to AAI because of its relationship with the Fund, known as fall-out benefits.

With respect to the Fund, the Board, including the Independent Trustees, noted the following:

(i) LGRO

The gross management fee rate for LGRO is lower than the median of its FUSE expense group. LGRO’s net expense ratio is lower than the median of its FUSE expense group.

The Board, including the Independent Trustees, reviewed and noted the relatively small size of LGRO and the analysis AAI had conducted to support AAI’s assertion that it was not realizing any economies of scale with respect to LGRO.

# Level Four Large Cap Growth Active ETF

## Statement Regarding Basis

November 30, 2024 (Unaudited)

## for Approval of Investment Advisory Contract

In voting to renew the Investment Advisory Agreement with AAI, the Board, including the Independent Trustees, concluded that the terms of the Investment Advisory Agreement are reasonable and fair in light of the services to be performed, the fees paid by certain other funds, expenses to be incurred and such other matters as the members of the Board, including the Independent Trustees, considered relevant in the exercise of their reasonable business judgment. The Independent Trustees did not identify any single factor or group of factors as all important or controlling and considered all factors together.

The Board, including the Independent Trustees, discussed the Level Four Sub-Advisory Agreement.

In evaluating the Level Four Sub-Advisory Agreement the Board, including the Independent Trustees considered various factors, including (i) the nature, extent and quality of the services provided by Level Four with respect to LGRO under the Level Four Sub-Advisory Agreement; (ii) the advisory fees and other expenses paid by LGRO compared to those of similar funds managed by other investment advisers; (iii) the profitability to Level Four of its sub-advisory relationship with LGRO and the reasonableness of compensation to Level Four; (iv) the extent to which economies of scale would be realized if, and as, LGRO's assets increase, and whether the fee level in the Level Four Sub-Advisory Agreement reflects these economies of scale; and (v) any additional benefits and other considerations.

With respect to the nature, extent and quality of the services provided by Level Four under the Level Four Sub-Advisory Agreement, the Board, including the Independent Trustees considered and reviewed information concerning the services provided under the Level Four Sub-Advisory Agreement, LGRO's performance, financial information regarding Level Four, information describing Level Four's current organization and the background and experience of the persons responsible for the day-to-day management of LGRO. Based upon their review, the Board, including the Independent Trustees concluded that Level Four was qualified to oversee the portfolio management of Level Four and that the services provided by Level Four to LGRO are satisfactory.

The Board, including the Independent Trustees considered that the contractual sub-advisory fee to be paid to Level Four with respect to LGRO was 0.25% of LGRO's average daily net assets out of a total management fee of 0.50% of LGRO's average daily net assets.

In reviewing LGRO's profitability with respect to Level Four, the Board, including the Independent Trustees considered the resources involved in managing LGRO.

The Board, including the Independent Trustees also considered other benefits that have been and may be realized by Level Four from its relationships with LGRO, known as fall-out benefits.

The Board, including the Independent Trustees considered the extent to which economies of scale may be realized if LGRO's assets continue to grow in size and whether fee levels reflect a reasonable sharing of such economies of scale for the benefit of the Fund's investors. The Board, including the Independent Trustees noted that LGRO commenced operations on August 22, 2023 and has not yet achieved scale in terms of assets. The Independent Trustees determined that AAI should continue to keep the Board informed on an ongoing basis of any significant developments (e.g., material increases in asset levels) so as to facilitate the Independent Trustees' evaluation of whether further economies of scale have been achieved with respect to LGRO.

In voting to approve the Level Four Sub-Advisory Agreement, the Board, including the Independent Trustees concluded that the terms of the Level Four Sub-Advisory Agreement are reasonable and fair in light of the services performed, expenses incurred and such other matters as the Board, including the Independent Trustees considered relevant in the exercise of their reasonable business judgment. The Board, including the Independent Trustees did not identify any single factor or group of factors as all important or controlling and considered all factors together.

At its meeting held on November 8, 2024, the Board, where certain Trustees were not an "interested person" of the Trust within the meaning of the Investment Company Act of 1940, as amended (the "Independent Trustees"), evaluated a proposal to approve a new Investment Sub-Advisory Agreement between the Trust, AAI and Level Four with respect to the Fund (the "New Level Four Sub-Advisory Agreement") in advance of a transaction involving the transfer of a majority equity position in Carr, Riggs & Ingram, LLC ("CRI"), the parent company of Level Four, to a group of new investors which include Centerbridge Partners, L.P. and Bessemer Venture Partners (the "Transaction"). The Transaction closing constitutes a deemed "assignment" of the Level Four Sub-Advisory Agreement and therefore results in the automatic termination of such agreement under the Investment Company Act of 1940, as amended. The New Level Four Sub-Advisory Agreement contains materially identical terms as compared to the Level Four Sub-Advisory Agreement.

The Board, including the Independent Trustees, discussed the Transaction, Level Four, the Level Four Sub-Advisory Agreement and the New Level Four Sub-Advisory Agreement, as applicable. The Independent Trustees also met separately to consider the foregoing. At the Board meeting and

# Level Four Large Cap Growth Active ETF

## Statement Regarding Basis

November 30, 2024 (Unaudited)

## for Approval of Investment Advisory Contract

throughout the process of considering the Transaction, the Board, including the Independent Trustees, was advised by counsel to the Independent Trustees and counsel to the Trust.

In their consideration of the New Level Four Sub-Advisory Agreement, counsel to the Independent Trustees and counsel to the Trust requested certain materials from Level Four and reviewed their responses thereto. The Board communicated with representatives of Level Four regarding their personnel, operations and financial condition. The Board also reviewed the terms of the Transaction and considered its possible effects on the Fund and its shareholders. In this regard, the Trustees spoke with representatives of AAI and Level Four during the Board meeting and, with respect to the Independent Trustees, in private session to discuss the anticipated effects of the Transaction.

During these meetings, the representatives of AAI and Level Four indicated their belief that the Transaction would not adversely affect (i) the continued operation of the Fund, or (ii) the capabilities of Level Four to continue to provide the same level of sub-advisory services to the Fund. AAI recommended that the Board approve the New Level Four Sub-Advisory Agreement.

In determining whether to approve the New Level Four Sub-Advisory Agreement, the Board received information and made inquiries into all matters as it deemed appropriate. The Board reviewed and analyzed various factors it deemed relevant, including the following factors, among others, none of which by itself was considered dispositive:

- the terms of the New Level Four Sub-Advisory Agreement, including the fees payable by AAI to Level Four, are the same as the Level Four Sub-Advisory Agreement, but for the new commencement date;
- assurances from Level Four that the manner in which the Fund's assets are managed will not change as a result of the Transaction, that the same people who currently manage the Fund's assets are expected to continue to do so after the Transaction, and that Level Four will seek to ensure that there is no diminution in the nature, quality and extent of the services provided to the Fund by Level Four;
- Level Four's financial condition, its parent company's (CRI's) financial condition, as well as the financial condition of the two new investors in CRI in connection with the Transaction;
- that while the operations of Level Four are expected to continue without change following the Transaction, Level Four expects to benefit indirectly from the Transaction;
- the potential adverse effects on the Fund in the event the Transaction is completed and the New Level Four Sub-Advisory Agreement is not approved;
- the fact that Fund shareholders will not bear any costs in connection with the Transaction because Level Four or its affiliates have committed to pay the expenses of the Fund in connection with the Transaction; and
- representations from Level Four that there are no other material updates to the information provided by Level Four to the Board in support of the Board's consideration and approval of the continuance of the Level Four Sub-Advisory Agreement at its June 2024 meetings.

In voting to approve the New Level Four Sub-Advisory Agreement, the Board, including the Independent Trustees, concluded that the terms of the New Level Four Sub-Advisory Agreement are reasonable and fair in light of the services performed, expenses incurred and such other matters as the Board, including the Independent Trustees, considered relevant in the exercise of their reasonable business judgment. The Board, including the Independent Trustees, did not identify any single factor or group of factors as all important or controlling and considered all factors together.



This report has been prepared for shareholders of the ETF described herein and may be distributed to others only if preceded or accompanied by a prospectus.

ALPS Portfolio Solutions Distributor, Inc.,  
a FINRA member, is the distributor for the ETF.